

Serial No.: 09/654,951
Attorney Docket No.: F-100

Patent

REMARKS

Claims 1 -28 were currently pending in the Application. Applicants have amended claim 3. Applicants respectfully request entry of the above amendments and consideration of the enclosed remarks. Applicants submit that no new matter is added. Accordingly, claims 1-28 will remain pending in the application.

In section 3 of the Office Action, the Examiner rejected Claims 1-5, 8-18, 20 and 22-28 and 13 under 35 U.S.C. 103(a) as allegedly rendered obvious by U.S. Patent No. 5,367,464 to Abumehdi, et al. ("Abumehdi '464") in view of U.S. Patent No. 6,076,072 to Libman ("Libman '072").

Applicants respectfully traverse the rejection.

Applicants respectfully submit that the Examiner has not put forth a prima facie case of obviousness. Initially, Applicants respectfully submit that the cited references are not properly combined and that there is no motivation to combine the references. Furthermore, it is clear from Abumehdi '464 at Col. 1, lines 10-48 and Col. 3, lines 3-65 that only one module could access the credit update amount record. Such update record has a one-to-one correspondence with the one franking meter. Accordingly, Abumehdi '464 specifically teaches away from allowing access to that particular record using more than one module. Accordingly, Applicants respectfully submit that the references are not properly combined and request that the Examiner withdraw the rejection.

Additionally, Applicants respectfully submit that Abumehdi '464 does not teach or suggest "summing said sets of audit data" wherein "each module increments a set of audit data".

Accordingly, for at least the reasons stated above, Applicants respectfully submit that the cited references do not alone or in proper combination render the invention as presently claimed in claims 1-5, 8-18, 20 and 22-28.

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With regard to claim 4, Applicants respectfully submit that the cited reference does not teach or show "controlling said selected module to generate and return to said requesting user a digital postal indicium in accordance with said request".

With regard to claim 8, Applicants respectfully submit that the cited reference does not teach or show "audit data comprise increments of a linear error correcting code".

With regard to claim 13, Applicants respectfully submit that the cited reference does not teach or show "arithmetic sums of said values across said modules can be compared with arithmetic sums across said records".

Independent claim 15 and the claims dependent there from are patentable over the cited references for at least the reasons stated above.

Accordingly, Applicants respectfully request that the Examiner withdraw the rejection to claims 1-5, 8-18, 20 and 22-28.

In section 4 of the Office Action, the Examiner rejected Claims 6-7, 19 and 21 under 35 U.S.C. 103(a) as allegedly rendered obvious by U.S. Patent No. 5,367,464 to Abumehdi, et al. ("Abumehdi '464") in view of U.S. Patent No. 6,076,072 to Libman ("Libman '072") and further in view of U.S. Patent No. 5,778,076 to Kara, et al. ("Kara '076").

Applicants respectfully traverse the rejection.

Applicants respectfully submit that the Examiner has not put forth a prima facie case of obviousness. Initially, Applicants respectfully submit that the cited references are not properly combined as shown above.

Applicants respectfully submit that claims 6-7 and 19 and 21 depend directly or indirectly either from claim 1 or 15 and are patentable over the cited references for at least the same reasons.

Accordingly, Applicants respectfully request that the Examiner withdraw the rejection.

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Accordingly, Applicants submit that the invention as presently claimed in claims 1-28 is patentable over the cited references and in condition for allowance.

CONCLUSION OF REMARKS

For at least the reasons stated above, it is respectfully submitted that the remaining claims of this application are in condition for allowance and early and favorable action thereon is requested.

If the Examiner believes that additional issues may be resolved by a telephone interview, the Examiner is respectfully urged to telephone the undersigned attorney for Applicants at (203) 924-3180.

AUTHORIZATION

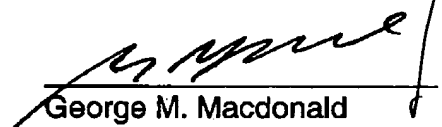
No fee is believed due with this response, other than the fee enclosed with the attached petition for a one-month extension of time to respond. However, the Commissioner is hereby authorized to charge any additional fees which may be required for the response or credit any overpayment to the Pitney Bowes, Inc. Deposit Account Number 16-1885, Order No. F-100.

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In the event that an extension of time or additional extension of time is required to make this response timely filed, the Commissioner is requested to grant a petition for that extension of time that is required to make this response timely. The Commissioner is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to the Pitney Bowes, Inc. Deposit Account Number 16-1885, Order No. F-100.

Respectfully submitted,



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APPENDIX A

Version with Markings to Show Changes Made

In the claims:

Claim 3 has been amended according to the marked up version shown below:

3. (Amended) A method as described in claim 2 wherein said selected module incorporates cryptographically processed [encrypted] information in said record to prevent generation of fraudulent records.